

Honorable commissioners,

I am concerned about the implementation of an Internet based, data monitoring system. My work is writing telecommunications software for small to medium cellular service providers and I am familiar with the CALEA system. Such a system works well for telecommunications because the telecommunications network is setup in a way which assigns nodes (phones) a static, unique ID within the telecommunications network. For most small to medium ISPs, this is not the case. Customers receive dynamic addresses which are necessary to limit consumption of IP space and keep costs down for these companies.

Making it a federal requirement that ISPs be able to provide a CALEA style interface for any of their subscribers would require, in most cases additional equipment purchases for the ISP, and in some cases entire network redesigns. This would bring undo burdon on the ISPs with little or no compensation. Most of the telecommunications world is subsidized, the ISPs are not. Is the FCC prepared to aid the ISPs in meeting these proposed requirements?

Thank you for your consideration of these issues.

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Franklin Marmon
200 Fairview Ave
Missoula, MT 59801